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April 20, 2023

VIA ECF

Hon. Cathy Seibel
The Hon. Charles Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: Doe v. Bard College, 7:22-cv-7258 (CS)

Dear Judge Seibel:

We represent Defendant Bard College (“Bard”) in the above-referenced action. As the Court may recall, on January 5, 2023, it entered an order directing that the original Complaint in this action be sealed and, further, that “obviously the parties are required to treat it as sealed going forward.” ECF No. 47 (the “January 5 Order”). Plaintiff’s counsel recently advised us, in connection with pending motion practice in the related state court action, that the now-sealed Complaint in this action remains available elsewhere the docket. Upon review of the docket, it appears that the original Complaint is available at ECF No. 32-2 and a proposed redacted version of the Complaint is available at ECF No. 39-1. The proposed redacted complaint at ECF No. 39-1 contains only minor redactions and, therefore, contains much of the information sought to be protected by this Court’s January 5 Order sealing the original Complaint.

Accordingly, for the reasons underlying this Court’s January 5 Order, Bard respectfully requests that this Court also seal ECF Nos. 32-2 and 39-1.

We are available at the Court’s convenience should it require any additional information. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Nicholas J. Faso

Nicholas J. Faso

cc: All counsel of record via ECF.